

**REMARKS**

The Examiner objected to Figures 6-8 of the application as disclosing only that which is already known. Applicants have amended Figures 6-8 to include a legend indicating that these figures are "Prior Art."

Applicants have also amended Figures 1, 4, and 6 to correct a typographical error in which registers 141-1, 141-2, 21-1, 21-2, and 21-3 were depicted as "resisters." This typographical error also occurs throughout the specification and in claim 4. Appropriate amendment to the specification and claims to correct this error has been made.

Claims 1 and 7 stand rejected under 35 USC 103(a) as unpatentable over the prior art described in the specification in view of Okuzono. This rejection is respectfully traversed. Claims 1 and 7, as amended, recite "wherein the pixels are configured to sequentially receive  $\gamma$ -corrected display signals for each of the color components" and "sequentially writing the  $\gamma$ -corrected display signals for each of the color components." These features are not taught by the prior art.

In the Action, the Examiner stated that the prior art shown in Figure 8 teaches the features of receiving  $\gamma$ -corrected display signals at different timings of a time sequence. Applicants respectfully submit that Figure 8, as understood in light of its description at page 2, lines 20-24, of the specification, does not teach the claimed invention. The specification describes the timing chart of Figure 8 by noting that "the RGB display data that is consecutively sent based on the horizontal scanning signal is then stored in the registers 21-1, 21-2, and 21-3." Applicants submit that registers 21-1, 21-2, and 21-3, shown in Figure 6, do not contain  $\gamma$ -corrected display data. Figure 6 shows that the output of gamma-correction voltage generating circuit 24 is connected to a series of DA converters (23-1, 23-2, and 23-3) which also receive, as inputs, the outputs of registers 21-1, 21-2 and 21-3. Thus, it is clear from Figure 6 that registers

21-1, 21-2, and 21-3 do not contain gamma-corrected display data and that the timing effect described in Figure 8 is only applied to uncorrected display signals.

Okuzono also fails to disclose sequentially receiving and writing  $\gamma$ -corrected display signals for each color component. Rather, the portion of Okuzono cited by the Examiner describes that the gamma correction circuitry includes a separate functional gamma correction unit for each color. The specification at page 9, lines 19-22, describes that “the writing period is divided corresponding to the each of the RGB color components in this embodiment, therefore, it is not necessary to form the  $\gamma$ -correction circuit for each of the RGB color components, preventing the enlargement of the circuit scale.” The portion of Okuzono cited by the Examiner, however, describes that “all of the data signal output sections  $25_R$ ,  $25_G$ , and  $25_B$  have the same configurations.” Because Okuzono describes a separate and complete  $\gamma$ -correction circuit for each of the RGB color components and fails to teach sequentially receiving and writing  $\gamma$ -corrected display signals for each color component, it is not relevant to the claimed invention.

Applicants further submit that the Examiner has failed to identify any motivation to combine the teachings of the prior art described in the specification with the teachings of Okuzono. In the Action, the Examiner described the operation of the prior art systems and then concluded that the combination with Okuzono would be obvious because it would “create a display device with better reproducibility of each color.”

Applicants submit that the motivation provided by the Examiner, a motivation provided without any reference to any teaching in the prior art, is improper. When determining obviousness, “the [E]xaminer can satisfy the burden of showing obviousness of the combination ‘only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in art would lead that individual to combine the relevant teachings of the references.’” *In re Lee*, 61 USPQ2d at 1434. “Broad conclusory statements regarding the teaching of multiple references, standing alone, are not ‘evidence.’” *In re Dembiczak*, 175 F.3d

994, 999, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999). Citing *In re Dembiczak*, the Board in *Ex parte Bostrom* (Unpublished BPAI opinion in Appeal No. 2000-0338), concluded that the Examiner's "broad conclusory statements of 'insuring correct and accurate sensors' and accomplishing 'a versatile, robust system that would work in a myriad of weather conditions,' standing alone, are not evidence." Applicants submit that the Examiner's rationale for the combination in this case, a statement of the purported benefits of the combination without any reference to the prior art itself, is no better supported than the rationale found to be insufficient in *Ex parte Bostrom* which may not be "precedential" but is indicative of how the Board addresses this type of issue.

Claims 2-4 stand rejected as unpatentable over the prior art described in the specification in view of Okuzono and Bitzakidis. Claim 2, as amended, recites "sequentially supplying the  $\gamma$ -corrected voltage selectively to one of the set of the predetermined number of the pixels for each of the color components." Bitzakidis, however, does not disclose this feature and is not relevant to the claimed invention. While the Examiner cited Figure 2 of Bitzakidis and stated that Bitzakidis teaches a switching circuit receiving a gamma-corrected signal, applicants submit that nowhere does Bitzakidis describe gamma correction or operation on a gamma-corrected signal. Thus the prior art described in the specification in combination with Okuzono and Bitzakidis fails to teach this claimed feature.

Applicants submit that the motivation provided by the Examiner for combining Bitzakidis with the prior art described in the specification and Okuzono is improper. In rejecting claims 2-4 as obvious, the Examiner simply described the operation of the prior art systems and then concluded that the combination with Bitzakidis would be obvious because it would "create a display device with better reproducibility of each color." This motivation is insufficient for the reasons given above with reference to the rejection of claims 1 and 7.

Claims 3 and 4 are dependent from claim 2 and are therefore also patentable for the reasons given above with reference to claim 2. Claims 5 and 6 stand rejected as unpatentable over the prior art described in the specification in view of Okuzono, Bitzakidis, and Hong. Claims 5 and 6 are dependent from claim 3 and are therefore also patentable for the reasons given above with regard to claim 2.

Withdrawal of the rejections and an early action allowing claims 1-7 is earnestly solicited.

If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below. In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 492322013300.

Dated: December 15, 2005

Respectfully submitted,

By 

James M. Denaro

Registration No.: 54,063

MORRISON & FOERSTER LLP

1650 Tysons Blvd, Suite 300

McLean, Virginia 22102

(703) 760-7739

**In the Drawings:**

The attached drawing sheets include replacement sheets for Figs. 1, 4, and 6-8.

Attachments: Replacement sheets